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July 2, 2012

Via E-Mail
Via Federal Express

Carol J. Pokomy
Technical Enforcement Program
US EPA, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Re: First Annual Demand for Reimbursement of Oversight Costs
Rico Site: Unilateral Administrative Order for Removal Action, EPA Docket
#CERCLA-08-2011-0005

Dear Ms. Pokomy:

This letter will acknowledge receipt of EPA's demand directed to Atlantic Richfield Company (Atlantic Richfield) for reimbursement of oversight costs under the referenced Order, as set forth in EPA's correspondence to me dated June 22, 2012. EPA requests reimbursement of costs in the amount of \$315,059.88.

The documentation provided by EPA in support of certain expenditures within the demand for reimbursement is not sufficient to assess whether EPA's costs are recoverable under CERCLA and the NCP. Specifically, Atlantic Richfield requests that EPA provide further documentation to describe URS's activities at the Site, including, for example, copies of site-specific vouchers, progress reports, tasking documents, and available SCORPIO\$ reports.

Atlantic Richfield does not require any further documentation related to the request for reimbursement of other EPA contractors or program personnel costs that are part of the present demand. Atlantic Richfield has taken steps to authorize payment of these costs within the thirty (30) day timeframe required under the Order. With allocation of indirect costs, the non-URS costs included in the EPA demand total \$107,601.19.


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Please transmit the requested records which describe URS's activities and costs to Adam Cohen or Eric Waeckerlin in my office, at your earliest convenience. Thank you for your consideration in providing the requested documentation.

Sincerely,


William J. Duffy
for
DAVIS GRAHAM & STUBBS LLP

cc: Amelia Piggott, Esq.
Andrea Madigan Esq.
Martha Walker
Anthony R. Brown
Cord Harris
Sheila D'Cruz, Esq.
Adam Cohen. Esq.
Steve Way